

REMARKS

Claims 1-18 are pending in this application. Claims 1-18 stand rejected. By this Amendment, claims 1, 2, 9, 10, 12, and 17 have been amended. The amendments made to the claims do not alter the scope of these claims, nor have these amendments been made to define over the prior art. Rather, the amendments to the claims have been made to improve the form thereof. In light of the amendments and remarks set forth below, Applicants respectfully submit that each of the pending claims is in immediate condition for allowance.

Claims 1-18 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. While Applicants respectfully submit that the claim limitation "memory access unit" is synonymous with "memory bus that accesses said memory," Applicants have removed this limitation from the claims. Applicants have amended the claims to the condition they were in prior to the Examiner's rejection under 35 U.S.C. § 112. Thus, the rejection under 35 U.S.C. § 112, first paragraph, has been rendered moot. Therefore, Applicants respectfully request withdrawal of this rejection.

Claims 1-14 and 16-18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,208,689 ("Ohira"). Applicants respectfully request reconsideration and withdrawal of this rejection.

Among the limitations of Applicants' independent claims not present in the cited reference is the memory access width controller that controls said quantization controller such that bit allocation is controlled in relation to a number of bits of a memory access unit of said memory.

The Office Action equates Ohira's storage memory with the memory access unit of the present application. This is incorrect. The memory access unit provides

access to a memory. In contrast, the storage memory stores data input via the memory access unit. Thus, the storage memory is different than the memory access unit.

Likewise, the number of bits of the memory access unit is different than the number of bits of the storage unit itself. In other words, the claimed memory access unit is equivalent to an entrance ramp of a parking garage and the storage memory disclosed in Ohira is equivalent to the parking garage accessed by the entrance ramp. It would be improper to equate the number of parking spaces in a parking garage with the size of the entrance ramp. Likewise, it is improper to equate the size of Ohira's storage memory with the size of Applicants' memory access unit. Further, Ohira neither discloses nor suggests varying bit allocation, i.e., the number of coded bits, as a function of the size of the memory access unit. In fact, Ohira is completely silent as to the memory access unit.

Because Ohira fails to disclose or suggest controlling bit allocation as a function of the number of bits of the memory access unit, Applicants respectfully submit that the rejection under 35 U.S.C. § 102(e) should be withdrawn and the claims passed to issue.

Claim 15 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Ohira in view of U.S. Patent No. 6,243,421 ("Nakajima"). Applicants respectfully request reconsideration and withdrawal of this rejection.

As discussed above, Ohira fails to disclose controlling bit allocation in relation to a number of bits of the memory access unit of said memory. Nakajima was not included to cure this deficiency but to disclose an additional limitation which, even if it were to show, does not cure the deficiency in Ohira discussed above. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a).

Applicants have responded to all of the rejections and objections recited in the Office Action. Reconsideration and a Notice of Allowance for all of the pending claims are therefore respectfully requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

If the Examiner believes an interview would be of assistance, the Examiner is welcome to contact the undersigned at the number listed below.

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Respectfully submitted,

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